

JAN 08 2018

 AT SEATTLE
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 WESTERN DISTRICT OF WASHINGTON
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 UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Civil Action No. 17-CV-1077RSL

 Defendant
 Jeremy Reeves

 ME2 PRODUCTIONS, INC
 (Plaintiff) David Lowe

V.

 *JEREMY REEVES; and
 Robert Kariuki
 (Defendants)

 Opposition to Plaintiff (DKT 49), and
 26(f) conference/joint-report issues.

Part 1

Deceiving the court and manipulation of 26(f) conference

Plaintiff is stagnant and has fully ignored the courts FRCP 26(f) conference deadline of November 30th 2017. In order to conceal this and move to manipulate and deceive the court Plaintiff has falsely back dated documents and has paraded them in front of the court. I provide evidence and prove this in exhibits A1-A3. In Dkt. 49 Exhibit A, Plaintiff presents a document/letter dated as November 29th 2017, this is a lie. Plaintiff did not create or mail this document until December 04 2017, he simply back dated it to November 29th 2017 trying to pretend he met the deadline set by the court and thus conceal his stagnation. Plaintiff claims he sent this letter also by email, he sent it to an email that isn't even mine (as presented in exhibit A1 and A3). I've never given him this email and he knows it's not a form of contact to me, my email is on all my documents and Plaintiff has had discourse through it with me in the past. The idea that Plaintiff would use an email that isn't a point of contact to me (when he has emailed

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 17-cv-01077

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1-3-2018

1 my actual address in the past), then claim to the court he used it to contact me is comical at
2 best. Rather than a stab at comedic relief this alludes to Plaintiffs common trend of
3 professional negligence and indifference towards the courts time, courts considerations, and
4 any defendant that is not a BAR member.

5 The court clearly states in Dkt. 43 page 2 that all FCRP/LCR 26(f) discussion shall be
6 conducted face to face or by telephone. "This conference shall be by direct and personal
7 communication, whether that be a face-to-face meeting or a telephonic conference." –The
8 Court (Dkt. 43, Page 2, Lines 6-7).

9 On top of just fully skipping 26(f) conference, Plaintiff waited until the very last possible
10 moment on December 14th 2017 to call me in order to meet the deadline of the court for joint
11 status report. Plaintiff waited to call me until the day this document was due *(after fully
12 skipping 26(f) conference) in an attempt to manipulate and railroad me, I will not accept and
13 fall into these traps of manipulation Plaintiff seeks to set upon me. Neither should the court
14 look past them and thus condone such behavior. Though the Plaintiff did send me emails
15 demanding me to call him he made no actual attempt to meet the courts joint-status guidelines
16 himself until the morning of December 14th 2017 when he called me the day the joint status
17 report is due. By this time I have no time to review the Plaintiffs propositions and join in his
18 status report, already predicting this behavior and attempt at manipulation by the Plaintiff I
19 already had a status report (compulsorily created solo) ready to submit to the court.

20 Though the Plaintiff did email me sending demands I call him, the Plaintiff made no
21 actual attempt to pick up his phone and call me himself. The Plaintiff presents these emails to
22 the court as if they are evidence of something or mean anything. Sending emails and placing a

1 phone call is not the same thing and the Plaintiff knows this. If the Plaintiff cares so little about
2 advancing his lawsuit that he can't pick up a phone that is not my fault or problem. Plaintiff
3 demanding I call through email is not the same as picking up the phone and placing a call to
4 advance his own lawsuit, as stipulated by the courts scheduling guidelines. Advancing the
5 Plaintiffs lawsuit against me is not my responsibility, it's his. Sending emails is not a
6 replacement for making a phone call. The plaintiff fully skipped 26(f) conference but was able
7 to place a phone call at the last possible minute on December 14th? This is an attempt at
8 manipulation. I've given him my number multiple times and it's provided in every document I
9 have submitted. For Plaintiff to claim I failed to meet deadlines because he can send emails all
10 day but can't just pick up his phone is a comical idea at best. Rather than a stab at comedic
11 relief though, this alludes to the level of professional negligence common from the Plaintiff.
12 Phone conversation requires more than hitting copy and paste on a computer as fast as
13 humanly possible, I suspect this is why Plaintiff is adverse to placing phone calls. Most every
14 email except maybe a section of one of them has been a copy and paste job from
15 Plaintiff.....Plaintiff cannot copy and paste phone calls and therefor seeks not to have them if
16 at all possible.

17 Plaintiff likes to present an air to the court to make it appear as if I am dodging or
18 avoiding him, and presents this as some type of indication of my guilt. This is far from true and
19 is a simple manipulation tactic that the court should be aware of (amongst many others Plaintiff
20 has thrown at me). I have talked to the Plaintiff on the phone, I have no problem/aversion
21 talking to the Plaintiff on the phone or meeting him in person. I'm not going to talk to him the

1 day the paperwork is due though and allow him to try to railroad me with his manipulation
2 tactics.

3 **Part 2**

4 **Opposition to Dkt. 49 (Declaration of David Lowe) in correlating numbered succession**

5 **1. "... and all documents referenced herein as true and accurate." – David Lowe.**

6 I prove in exhibit A1-A3 in this correspondence that this is not true. Plaintiff has
7 intentionally back dated documents to falsely parade in front of the court in attempt to
8 manipulate it.

9 **2. "The ISP Comcast positively identified Defendant Jeremy Reeves as the subscriber**
10 **responsible for the IP address at the relevant date and time the infringement occurred,..." –**
11 **David Lowe.**

12 The Plaintiff thinks because he used a subpoena to get my name it should mean
13 something extra to the court, he attempts to make this appear that in and of its self it proves I
14 am guilty of a crime *(because his only other actual evidence is of an IP number itself, an IP
15 number even when combined with its associated payee proves absolutely nothing). I would
16 have given this information to the Plaintiff myself, him doing it through subpoena means
17 nothing extra. Plaintiff attempts to make it appear as if someone paying to subscribe to an IP
18 address is a crime in and of its self.

19 **3. "We have independently confirmed that Defendant resides at the residence where IP**
20 **address was assigned via use of an investigative database..." "This corresponds to the start of**

1 observed BitTorrent activity beyond the motion picture title at issue in this case..." –David
2 Lowe

3 So the Plaintiff knows where I live and it correlates to an IP address, this is the full
4 extent of any investigation the Plaintiff has done. This is the full extent Plaintiff has of any
5 evidence of a crime, much less of me having committed it *(Plaintiff literally has no evidence).
6 Investigative data base? I could likely pull Plaintiffs address off the internet for free right now
7 from a Google search. If I can't find it for free I could definitely find it for 2 dollars. Is this what
8 Plaintiff calls an investigation and his investigative database?

9 Plaintiff states he observes activity beyond the motion picture title at hand. If it's
10 beyond what's at hand then why is Plaintiff bringing it up? I believe Plaintiff is professionally
11 negligent and have pointed out these situations in multiple documents, multiple times. Does
12 this mean I can limitlessly peer into Plaintiffs life beyond the issues at hand to find every other
13 possible way he is professionally negligent? It's probable I could find 100 different outside ways
14 Plaintiff is professionally negligent, then parade that as if it backs up the issues at hand. Can I
15 peer into Plaintiffs life (and/or its counsel David Lowe) for circumstances beyond the issues at
16 hand in this case, and then present what I find to the court? That is exactly what Plaintiff is
17 attempting to do to me. Why can I not do it back to him? Plaintiffs rights are no more or less
18 important than any defendants simply because he is a member of the BAR association,
19 plaintiff would love to make the court think otherwise and treat all defendants as such.

1 **4. "Plaintiff provided Defendant with another copy of the courts November 16, 2017 Order**
2 **regarding initial Disclosures, Joint Status Report..." "It also encouraged Defendant to contact**
3 **legal counsel." – David Lowe**

4 **Why would Plaintiff tell the court he provided me with something the court already**
5 **provided me with, what does this prove? It's simply a pile of extra garbage to throw into the**
6 **courts lap in attempt to support Plaintiffs manipulations. Plaintiff holds no respect for the**
7 **courts time, considerations, and Honorable Judges.**

8 **Why is Plaintiff so obsessed with me contacting legal counsel? Plaintiff is likely obsessed**
9 **with me contacting legal counsel so that I will find continuing through legal counsel too**
10 **expensive and rather than opposing Plaintiff I will accept a settlement agreement that Plaintiff**
11 **will only Broker through them (unless I sign for blanket guilt and a secret agreement before**
12 **being handed monetary charges) and thus contribute to the endless greed Plaintiff appeases by**
13 **building a never ending supply of victims feeding his pile of loot and booty.**

14 **Legal counsel or not, I will never sign a non-disclosure or secretive agreement with**
15 **Plaintiff or anyone he claims to represent (likely a shell company) and thus buy into and support**
16 **his scam and cache of loot/booty. Plaintiffs claims hold no backing, merit, and often lack**
17 **situational truth and practical application. Why would I need a lawyer to challenge at trial a pile**
18 **of faceless allegations? Buying a lawyer and then signing Plaintiffs secretive agreement actually**
19 **supports Plaintiffs scam more than it would protect me and future victims. * If Plaintiffs**
20 **allegations and claims were not so baseless then he wouldn't be so obsessed with me getting**
21 **a lawyer to broker a secret deal with him. Plaintiff mentions to the court at least 3-5X that he**

1 suggests I get a lawyer. He says it in almost every copy and paste email he sends to me. Frankly
2 I'm tired of hearing it and I'm tired of dealing with Plaintiffs nonsense. As long as he throws
3 merit-less blanket allegations at me though I will be forced to meet and oppose them.

4 5. Same as before

5 6. "...Defendant has made no effort to contact Plaintiff's counsel in order to conduct the
6 required Rule 26(f) conference." ... "None of the emails are regarding scheduling ... but rather
7 consist solely of threats and ad hominem attacks against Plaintiff's counsel." "Defendant has
8 likewise failed to provide his initial disclosures." - David Lowe

9 ***Plaintiff made no effort to contact me for 26(f) conference until his deadline was 4**
10 **days past.** Why does Plaintiff think it is my responsibility to contact him to advance his lawsuit
11 rather than him contact me? Plaintiff sent me a pile of mostly copied and pasted emails
12 demanding I call him for joint status report (though not for 26(f) conference). Who is Plaintiff to
13 demand and order what I must do? Can I also issue demands and orders to Plaintiff through
14 email? Plaintiffs rights are no more or less valuable than any defendants simply because he is
15 a member of the BAR association. If Plaintiff wants a phone conversation with me he should
16 call me himself, not send emails demanding I call him, he has no authority over me to demand I
17 do anything. Likewise, if I want to converse on the phone with Plaintiff I will call him, not send
18 emails demanding he calls me. Every step of this case Plaintiff attempts to make it appear I am
19 dodging/avoiding him and that this alludes to my guilt. Nothing is farther from true, I have
20 shown in every step I have no aversion to engaging directly with Plaintiff. If Plaintiff would have
21 called me I would have engaged with him, plain and simple. Plaintiff never called me until

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1 December 14th 2017 the day the joint report is due. I am not going to review Plaintiffs
2 propositions and manipulations last minute in a rush just so Plaintiff can claim he took the
3 necessary steps to advance his lawsuit. I don't know if the Plaintiff was attempting to set a trap
4 for me or if he is just expressing more professional negligence, either way, he failed to meet the
5 courts orders.

6 Plaintiff claims I threatened and ad hominem attacked him. Will the plaintiff specifically
7 point out what in the emails is true and what is false? Will he specifically point out everything in
8 the emails that is a true statement and what is a threat or ad hominem attack? If not then this
9 claim is mute and has nothing backing it, much like most all other claims from Plaintiff. Plaintiff
10 has ad hominem attacked and threatened me by claiming I would steal his movie and that he
11 will get into my pocket for it ... with no evidence to back his claims.

12 I provided Plaintiff with an initial disclosure, the court also has a copy of this (Dkt. 50).
13 By the date and manner I mailed this, Plaintiff should have had it for 2-3 days before making
14 this statement. Plaintiff sent me an initial disclosure and though it was mailed to my name he
15 wrote the contents (and labeled it as thus) for a man named Benjamin Justus , professional
16 negligence as usual and full indication of his constant (fast as possible) style of copying and
17 pasting the same things over and over. By the way Plaintiff skipped 26(f) conference without
18 attempting any contact then mailed me a letter falsely claiming he did, I figured he would claim
19 I never sent initial disclosure, thus why I also sent it to the court.

20 7. "... Plaintiff sent another letter ..." - David Lowe

Plaintiff can send me a million letters and a million emails demanding/ordering me to call him to advance his lawsuit in his place. I am open to engaging with the plaintiff but I will not advance Plaintiffs lawsuit for him. Plaintiff thinks demanding (by email or letter) for me to call him rather than him just calling me himself is a valid excuse as to why he failed to meet 26(f) conference by November 30th 2017(then back dated a document to claim he did), as well as waiting to December 14th 2017 to actually call me (the day joint status report is due).


7.1 "I declare under penalty of perjury that the foregoing is true and correct" – David Lowe

Does this include Plaintiff not meeting 26(f) conference of November 30th then backdating a document to parade in front of the court to claim he did?

Conclusion

Plaintiff David Lowe repeats many of the same arguments he has already presented to the court on multiple occasions. He could take time in his declaration to refute the vast amount of opposition I have provided to his claims in the past (and thus point the court toward a clearer decision or understanding as to how or why his claims are not merit-less), instead he simply repeats the same claims over and over again. Besides repeating the same claims over and over Plaintiff states he emailed/mailed me demanding to call him. Yet he never claims he actually picked up the phone himself to simply call and meet the courts requirement of a phone or face to face contact. If Plaintiff knocked on my door for conference I would let him in and give him tea and conference (he presents my address multiple times as hard evidence to the court yet he continually can't even get my email right), yet Plaintiff claims I dodge/avoid him simply because

1 I will not answer his emailed orders/demands. Plaintiff thinks that by backdating a document
2 and sending emails that he has pushed responsibility for skipping 26(f) conference and joint
3 status report off of his own shoulders and onto mine. The Plaintiff has failed to advance his
4 own lawsuit, and continually fails to present any defense towards my opposition of his merit-
5 less claims.



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EXHIBIT A-1

November 29, 2017

**FALSELY CLAIMED DATE OF PLAINTIFF MEETING 26(f)
DEADLINE**

VIA MAIL AND EMAIL

Email: jeremy13305@comcast.net

INVALID EMAIL, NEVER PROVIDED AS A CONTACT

Jeremy Reeves
13305 SE 19th St.
Vancouver, WA 98683

David A. Lowe, Esq.
Direct Dial: 206.381.3303
Lowe@LoweGrahamJones.com

Re: *ME2 Productions, Inc. v. Does 1-12*
Civil Action No. 17-cv-1077
Doc 9 / IP Address 73.67.249.208

Dear Mr. Reeves:

We are required by the Court to conduct a Rule 26(f) conference in this case by November 30, 2017, and thereafter exchange initial disclosures and submit a joint status report, as set forth in the enclosure. See attached order. As you are one of the last remaining active Defendants in this case, the conference will be between you and our office. We are jointly responsible for scheduling and conducting this conference and submitting the report.

Please contact our office right away to schedule a time when you are available for the required Rule 26(f) conference, which can occur by telephone. If you do not reach me directly, please leave

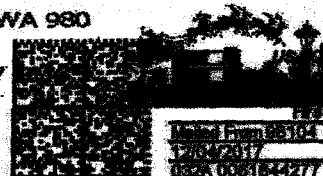


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SEATTLE WA 980

04 DEC 2017



Jeremy Reeves
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Vancouver, WA 98683

**PLAINTIFF SENDS CORRESPONDANCE ON 04 DEC 2017, NOT 29
NOVEMBER 2017 AS HE PRESENTS TO THE COURT**

986838574



EXHIBIT A-1

EXHIBIT A-2

986388574

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SEATTLE WA 98104
04 DEC 2017

DATE ACTUALLY SENT
"04 DEC 2017" ★

DATE ACTUALLY SENT
"04 DEC 2017" ★

EXHIBIT A-2

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Defendant
Jeremy Reeves

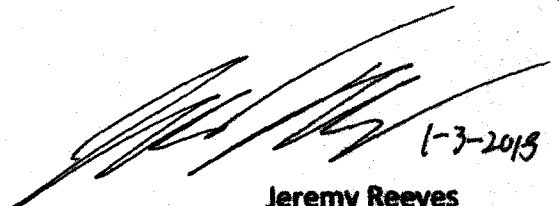
Civil Action No. 17-CV-1077RSL

Certificate of service

I certify that a true and correct copy of the foregoing document has been served to all counsel or parties of record.

Lowe Graham Jones
701 fifth avenue, suite 4800
Seattle, Washington 98104

Clerk of the Court
United States District Court for the Western District of Washington
700 Stewart Street
Seattle, WA 98101



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Reply/Defense For Motion To Dismiss

Civil Action No. 17-cv-1077RSL

Reeves, Jeremy
303 SE 19th St.
Vancouver, WA 98603


United States District Court for the Western District of Washington
700 Stewart Street
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JAN 08 2018

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FROM: (619) 748-8686 Jeremy Reeves	SHIP DATE: 04JAN18 ACTWGT: 0.20 LB CAD: 6996010/SSFD1822 DIMMED: 12 X 9 X 1 IN
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TO Clerk of the Court US Dist Court, Western Dist of WA 700 Stewart St Seattle WA 98101 (619) 748-8686 REF: DEPT: (US)	
	
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